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June 25, 2024

**VIA ECF**

The Honorable J. Paul Oetken  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Jackson v. American Civil Liberties Union, Inc., et al.*, No. 21-cv-5037(JPO)

Dear Judge Oetken:

We represent Plaintiff Robert Jackson and write with Defendants' consent to respectfully request that the in-person oral argument scheduled to take place on July 25, 2024 on Defendants' motion for summary judgment be converted to a virtual oral argument. *See* April 17, 2024 Electronic Order. Plaintiff seeks the requested relief because Plaintiff's counsel's fiancé is pregnant and is now scheduled to give birth on July 1, 2024. Plaintiff's counsel currently resides in Florida and it will be difficult to travel to New York for the conference immediately following the birth of his son given certain caregiving responsibilities.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "T. Crabill", is written over a light blue horizontal line.

Taylor J. Crabill